

EXHIBIT A

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 Before The Honorable Vince Chhabria, District Judge
4

5 KADREY, et al.,) No. C 23-03417-VC
6 Plaintiffs,)
7 vs.)
8 META PLATFORMS, INC.,)
9 Defendant.)
10

11 San Francisco, California
12 Friday, September 20, 2024

13 TRANSCRIPT OF PROCEEDINGS OF THE OFFICIAL ELECTRONIC SOUND
14 RECORDING 1:03 - 2:00 = 57 MINUTES

15 APPEARANCES:

16 For Plaintiffs:

17 Joseph Saveri Law Firm, LLP
18 601 California Street
Suite 1000
San Francisco, California
94108
19 BY: JOSEPH R. SAVERI, ESQ.
CHRISTOPHER K. L. YOUNG, ESQ.

20
21 Cafferty Clobes Meriwether &
Sprengel LLP
135 South LaSalle Street
Suite 3210
Chicago, Illinois 60603
22
23 BY: ALEXANDER J. SWEATMAN, ESQ.

24
25 (APPEARANCES CONTINUED ON THE NEXT PAGE.)

1 representations about the -- when you first received
2 documents in the case. I don't know, maybe you're doing
3 this because I previously sanctioned Meta and its lawyers
4 for discovery abuses. Maybe you're somehow like thinking
5 that you could take advantage of that.

6 But I assure you, Mr. Saveri, that I'm going to look at
7 every case individually. And it's obvious in this case,
8 that Meta has been litigating the case as if September 30th
9 is an actual discovery cutoff. And you and your team have
10 barely been litigating the case. That's obvious.

11 And so, here's what I'm going to tell you, all right.
12 And, moreover, this is an important case, right? This is
13 not -- this is not your typical proposed class action. This
14 is an important case. It's an important societal issue.
15 It's important for your clients. It's important for the
16 proposed class members. It's important for society.

17 And, you know, you and your team appear to have taken
18 on a case that you are either unwilling or unable to
19 litigate properly. And so, I will tell you right now that
20 if this case gets to the class certification stage, I will
21 not certify class represented by this legal team based on --
22 based on the way you've litigated the case so far.

23 I think what you need, frankly, is to bring in -- bring
24 in somebody who can help you litigate the case. Who has the
25 resources and the wherewithal to move this case forward.

1 Somebody like Sussman Godfrey or somebody like that who
2 actually has the ability to take on a complex matter like
3 this and litigate it properly. I think you need to
4 reconstitute your legal team.

5 And I will tell you, that I -- based on what I've seen
6 so far, there is no way that I will -- that I would grant
7 class certification. There is no way that I would find
8 adequacy of representation based on the representation that
9 I've seen take place thus far, okay.

10 I feel like I'm in a little bit of a bind here, because
11 -- and I don't know if maybe the Defendants can speak to
12 this. And, you know, the Defendants don't need to convince
13 me that we are here today because the Plaintiffs have failed
14 to move the case forward. I understand that.

15 But I'm in a little bit of a difficult position because
16 it is such an important case, and, you know, I -- if I deny
17 the motion to extend the discovery cutoff, right, it may be
18 that, you know, I am not going to be able to adjudicate the
19 question that is presented at summary judgment on a proper
20 record, right.

21 So maybe the answer is, fine, I deny the motion to
22 extend the discovery cutoff, and then I -- if there's no
23 proper record, that's the Plaintiff's fault, and so they
24 lose their case and some other plaintiffs are going to have
25 to bring a case against Meta, right, on this issue. Maybe